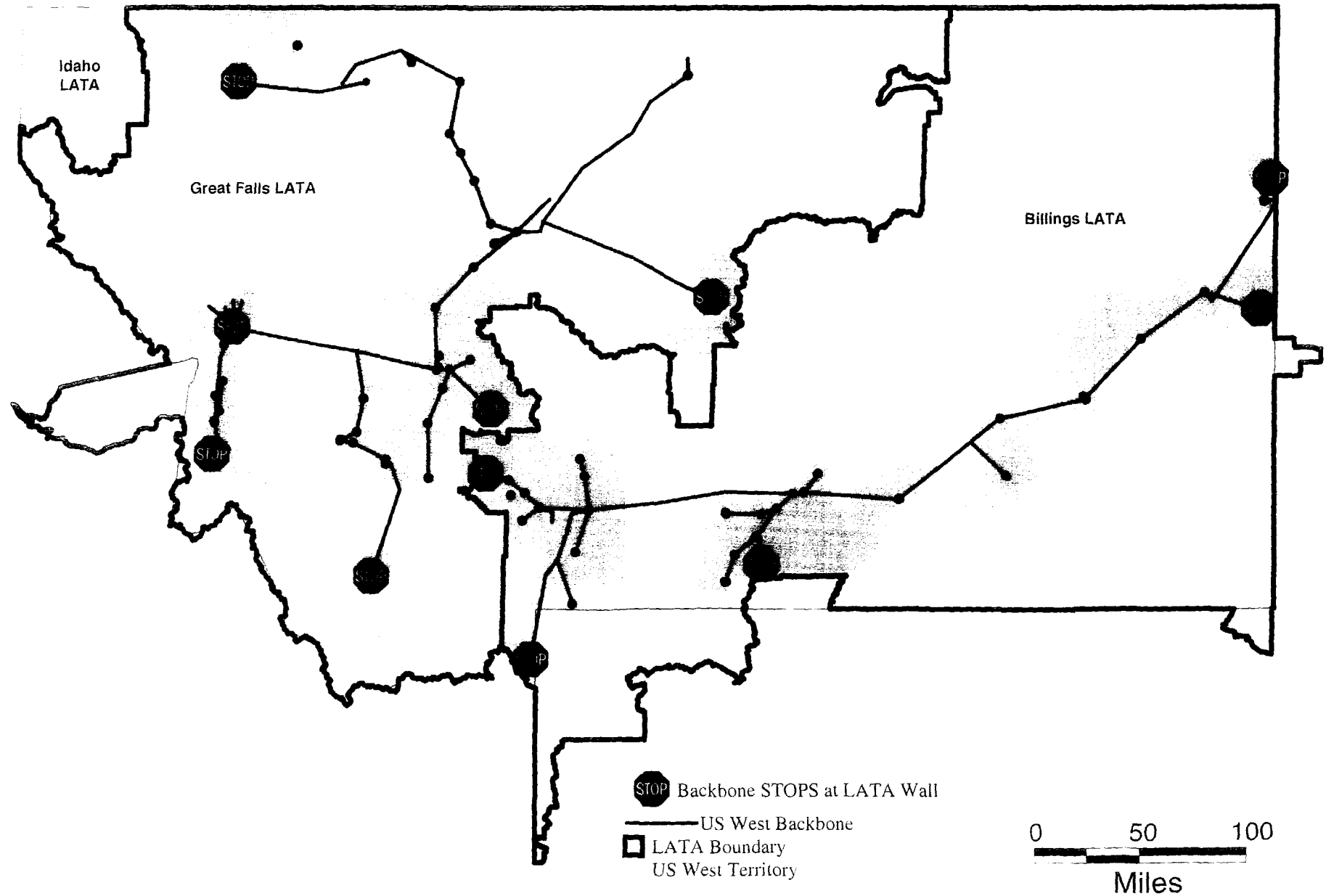


LATA Lines = Walls Preventing Communication



InContext and Principals

This report was prepared by **InContext**[®] Inc., an international information company based at 1615 L Street, N.W., Suite 650, Washington, D.C. 20036 (phone 202.659.1023, fax 202.293.9236). **InContext** specializes in politico-economic analyses that take economic data (such as numbers of jobs in specific types of local businesses) and juxtapose those data with local geographic areas defined either by a political jurisdiction (such as a state assembly district or a city council district) or an economic service jurisdiction (such as a daily newspaper service area, a local gas utility service area, or a *Yellow Pages* market area) or a particular local/regional market area impacted by a major entertainment/sports event.

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Major clients currently using **InContext's** products include: the Regional Bell Operating Companies (the Baby Bells), the Federal Reserve Bank of Chicago, the Penske Corporation, Eli Lilly, Philip Morris Companies, local gas utilities, and major media advertisers and distributors.

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Where ICG, AT&T/TCG, MCI & WorldCom Deploy Fiber Facilities and Provide Local Telephone Service in Denver and Where They Do Not

ANALYSIS & METHODOLOGY

The attached map of Denver juxtaposes the geo-economic relationship of two different business developments all relating to local telephone service:

1—the fiber grids of US West's Competitive Local Exchange Carriers—ICG, AT&T/TCG, MCI & WORLDCOM;

2—the precise geographic sites of all 1,592 businesses located in Denver neighborhoods where a majority of the population is African-American.

The analysis uses computer software based mapping technology to measure how Denver's CLECs have complied with the Communications Act of 1934, as amended in 1996, that service be provided "without discrimination on the basis of race [or] color..." To that end, computer software technology was used to 1—geocode the precise configuration of the CLEC grids, 2—geocode the precise location of all the businesses in majority African-American neighborhoods.

CONCLUSION

The analysis demonstrated that the CLEC grids are configured outside of the African-American neighborhoods and run in directions away from those neighborhoods, including the ICG fiber spur running easterly along the railroad track right of way of the Union Pacific Railroad. There are 1,592 businesses located in Denver's majority African-American neighborhoods.


The analysis also ascertained if any of the businesses in the majority African-American neighborhoods are receiving local telephone service from the CLEC providers whose fiber lines either flank small fringes of African-American neighborhoods or traverse via railroad right-of-ways significant parts of African-American neighborhoods.

1—The AT&T/TCG fiber grid flanks the southwestern portion of the majority African-American neighborhood. There are 82 businesses serving the African-American community in this sector; none are hooked up to the AT&T/TCG fiber grid.


2—The ICG fiber grid runs easterly along the Union Pacific Railroad right-of-way through the central-eastern sector of the African-American community. This ICG fiber segment essentially uses the railroad right-of-way to exit the center-city commercial district and run east to Stapleton Airport. None of the businesses serving the African-American neighborhoods along the railroad right-of-way are hooked up to the ICG fiber grid.

AUTHORITIES & SOURCES

This geo-economic mapping analysis was prepared by the international information firm of InContext Inc. InContext used publicly-available and independently-collected data sources for this analysis. InContext's credentials are attached on a separate page.



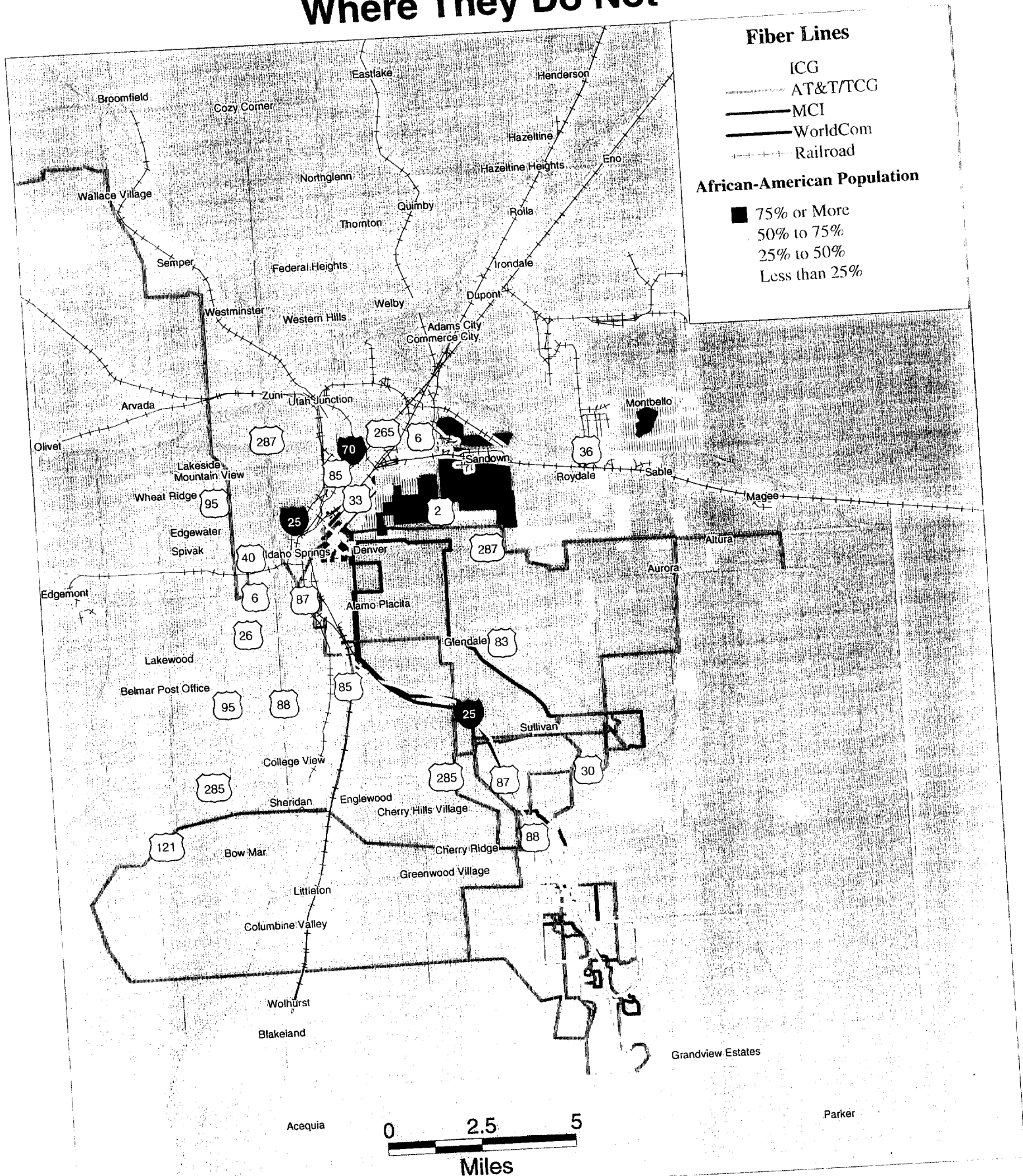
William Lilley III
Chairman & CEO



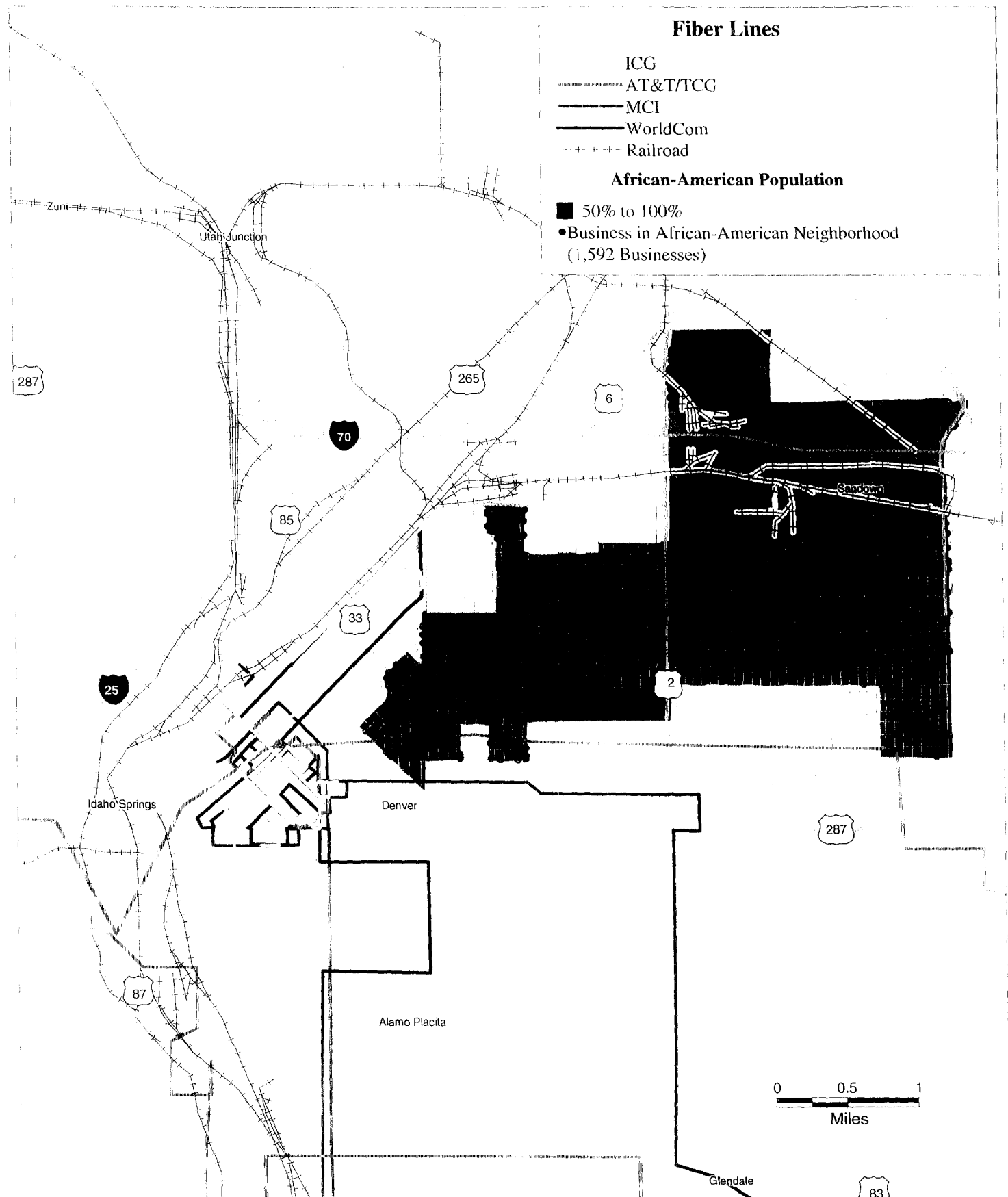
Laurence J. DeFranco
President & COO

April 27, 1998

Where ICG, AT&T/TCG, MCI, & WorldCom Provide Local Telephone Service in Denver and Where They Do Not



Where ICG, AT&T/TCG, MCI, & WorldCom Provide Local Telephone Service in Denver and Where They Do Not



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Where US West Deploys Advanced DSL Service in Denver

ANALYSIS & METHODOLOGY

The attached map of Denver juxtaposes the geo-economic relationship of two different business developments all relating to local telephone service:

- 1—the coverage area of US West's Advanced DSL service in Denver;
- 2—the precise geographic sites of all 1,592 businesses located in Denver neighborhoods where a majority of the population is African-American.

The analysis uses computer software based mapping technology to measure how US West has complied with the Communications Act of 1934, as amended in 1996, that service be provided "without discrimination on the basis of race [or] color..." To that end, computer software technology was used to:

- 1—geocode the precise coverage area of US West's advanced DSL service in Denver;
- 2—geocode the precise location of all the businesses in majority African-American neighborhoods.

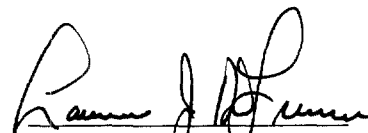
CONCLUSION

The analysis demonstrated that US West's Advanced DSL Service is configured to service 100% of the African-American neighborhoods. There are 1,592 businesses located in Denver's majority African-American neighborhoods—all being served by US West's DSL Service.

AUTHORITIES & SOURCES

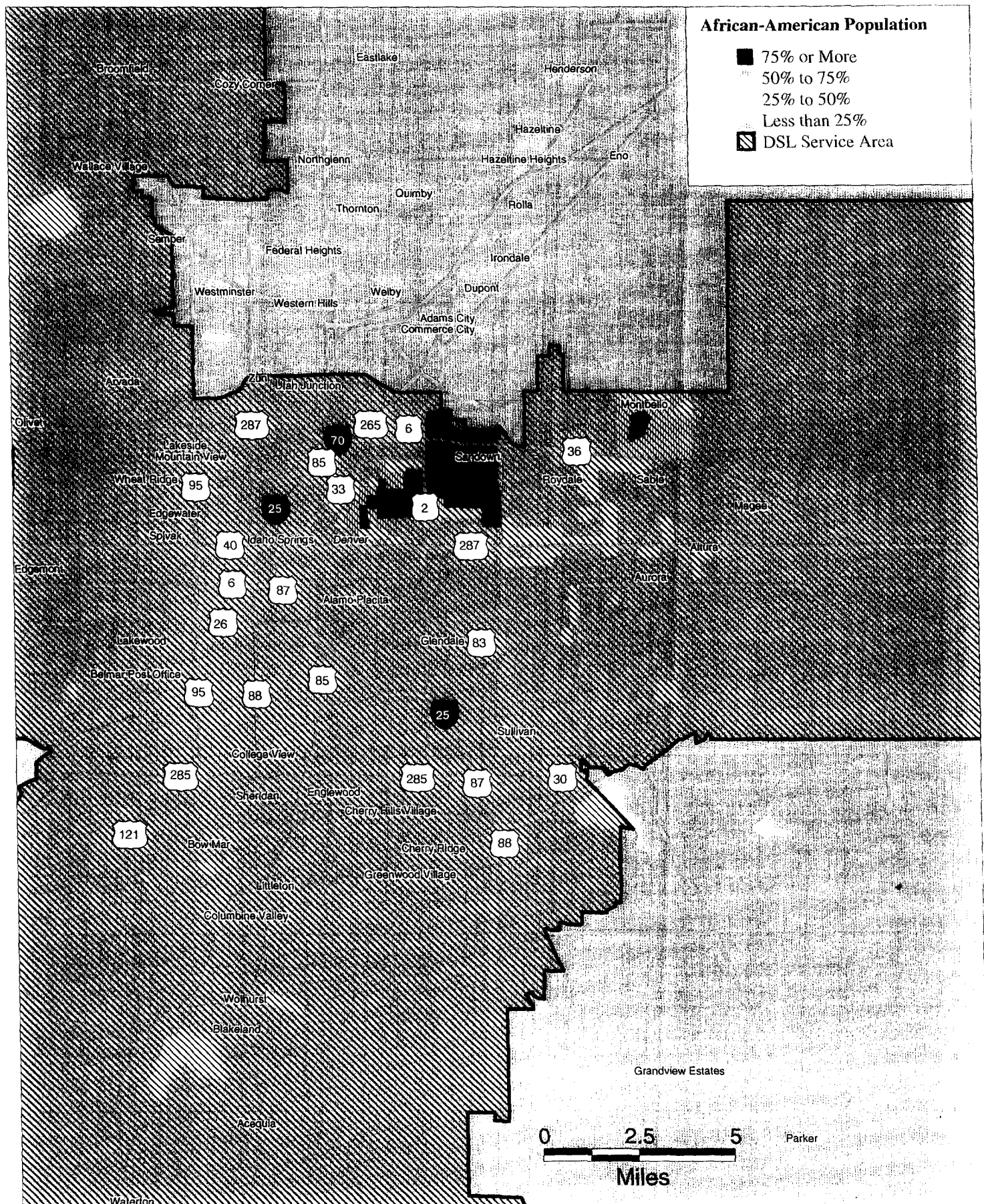
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Chairman & CEO


Laurence J. DeFanco
President & COO

May 1, 1998

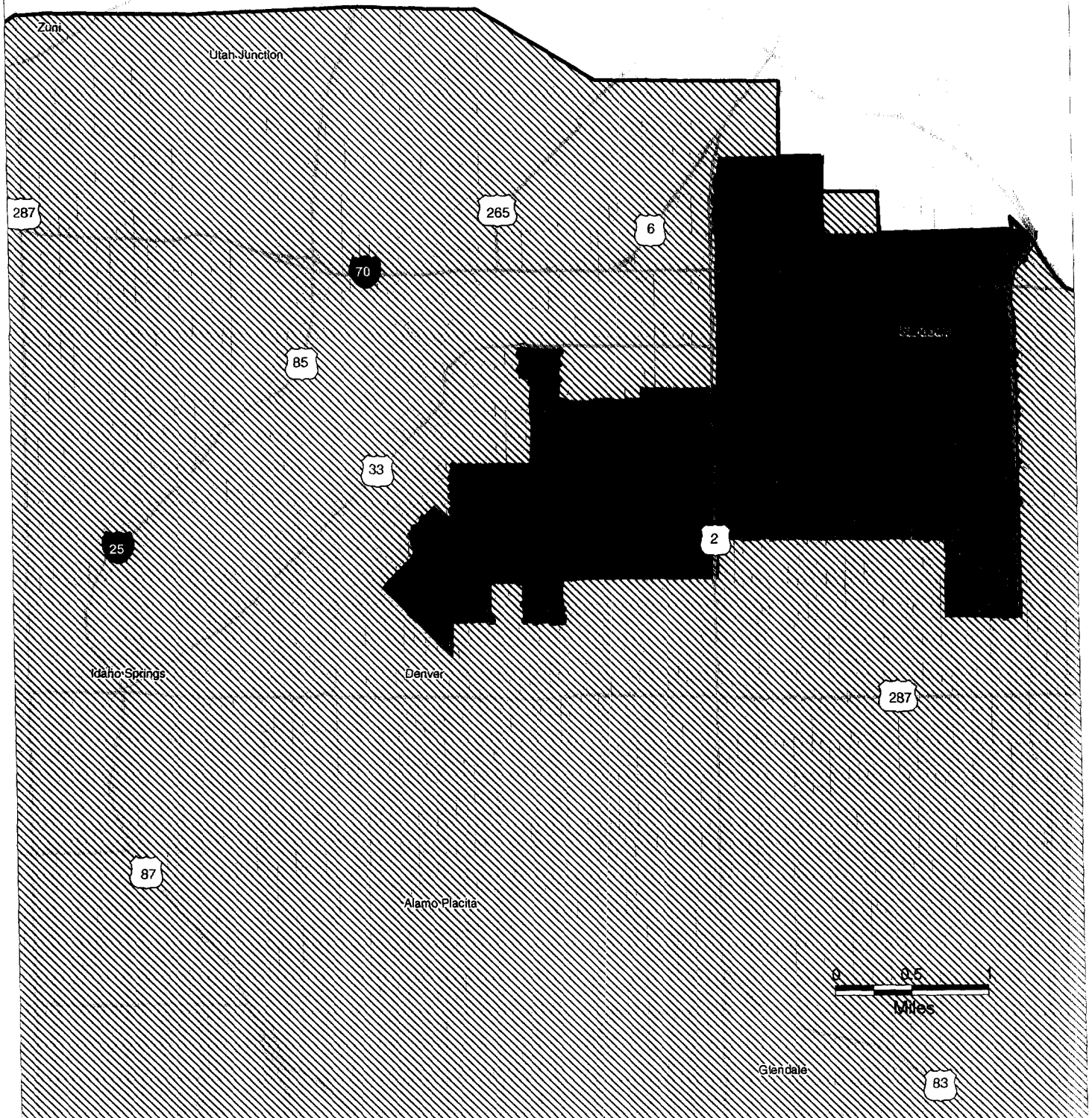
Where US West Provides Advanced DSL Service to Businesses in Denver



Where US West Provides Advanced DSL Service to Businesses in Denver

African-American Population

- 50% to 100%
- ▨ DSL Service Area
- Business in African-American Neighborhood
(1,592 Businesses)



ATTACHMENT C

D S L

D I G I T A L S U B S C R I B E R L I N E

Get your place in the DSL line!

Big news: this afternoon, March 3, US West confirmed an extraordinary offer – subscribers who sign up for DSL service within the first month of availability will have the equipment fee for the DSL modem waived. In other words, free gear! This is a very cool thing, it will make DSL incredibly affordable and we applaud US West for this. Sometimes, US West drives us nuts, but you've got to love them for this.

This offer is *only* available to people who sign a 1-year contract for DSL physical lines with US West.

Everyone who has already signed up on StarNet's pre-qualification form is eligible. In fact, it makes it even more important you act now to make sure your order is processed immediately. If you've already signed up, you don't have to do anything other than feel happy about the situation.

Shortly, US West will announce service availability dates for DSL service in Tucson. Obviously, we're pleased to see this happen – after all, we have been working to bring high-speed Internet access to Tucson for nearly two years.

For those of you who aren't familiar with the technology, Digital Subscriber Line Service (DSL) is an "always on" way to access the internet at very high speeds.

How fast? The basic DSL offering now is nearly 10 times faster than a 28,800 modem! In other words a file that would take an hour to download from the Internet with a 28,800 modem, will take only 6 minutes with a basic DSL link. And that's the basic speed!

But DSL is a tough technology to deliver and there are many possible hitches in the US West telco network that need to be resolved to ensure you can actually get DSL service at your location.

Because we had an unhappy surprise from a telco last year when we first tried to launch DSL service, we're not comfortable formally announcing StarNet DSL until *after* US West has officially announced an availability date.

Based on US West's progress, we believe the service will begin customer installations in mid-April.

But! We have been working closely with a special unit that serves ISPs within US West to streamline the line qualification and ordering process.

And there is something we **can** do today – begin taking requests for the necessary line qualifications, doing preliminary line checks and securing a spot in the installation queue for people.

This is important for two reasons:

- First, ordering DSL can be a painful process, and we want to make it as easy as possible.
- Second, once US West announces the availability of the service, orders will be taken on a first-come, first-served basis. To make sure that people who want StarNet DSL can get in immediately, we've created a special process to make sure our customers get into the order queue instantly.

If you use the StarNet DSL request form link below, we immediately will begin the necessary steps to ensure that your line is qualified and scheduled for installation as soon as humanly

possible. **At this point, we are handling all orders online only. StarNet customer support won't be able to answer questions or take orders for DSL over the phone for several weeks.**

At the moment, US West is still building the database that will be used to establish which lines can support DSL and which can't. We expect to see the qualification process begin in about three weeks. The *minute* the US West database is ready, we will transfer orders from our database into the US West qualification/order queue.

More importantly, there is necessary work that can be started today. Customers who are attached to Centrex services have a special step that must be taken. If one waits until US West's announcement, that step can add weeks of needless delays to the process. Thus, we can begin *immediately* to check on the Centrex status of lines and deal with problems now.

Once, US West actually begins line qualification and sets tentative delivery dates, we'll contact people who sign up and confirm the final order. And, assuming your line qualifies, we'll have your reserved delivery date in hand!

And throughout the process, we'll troubleshoot problems with US West for you, so you won't be alone in a faceless telco process.

In the unhappy event that your lines don't qualify for DSL service, don't despair. We are continuing to work on affordable high-speed net access plans that will provide alternatives to people who can't get DSL. We're determined to bring you the kind of access you want and need.

StarNet DSL offerings, when we can "officially" announce them (in other words after US West formalizes its delivery announcement) are slated to be highly affordable – they'll start at \$60 a month for 256K bi-directional service.* And that figure includes the DSL line charges.

There are important catches to be aware of when considering DSL service – many factors can affect whether or not your lines qualify. Distance is a big one, as well as other line conditions.

And, please be aware that when US West talks about a \$40 DSL circuit, it's only that: a physical circuit. You still need an Internet Service Provider to get you out on the net, just like you need one today over dial-up lines.

During the Phoenix roll-out of DSL service, many people felt misled when they called for their "\$40" DSL connection to the net only to discover that the DSL circuit itself only got you halfway there...

That's why we're here to dispell a great deal of the confusion and misconceptions and ensure that the public knows what it's getting and gets what it wants.

Follow these links for more information

[Check out our DSL FAQ for lots more information](#)

[Get yourself in the pre-qualification and installation line now](#)

A note on the pre-qualification form.

We will need to contact you to confirm your order once US West actually reaches the point of setting installation dates.

Getting your "pre-order" done now allows us to begin work early on dealing with issues like Centrex-related problems and get you in the queue for final line qualification/delivery early.

Indeed, because US West won't take public orders for weeks, you'll be in the pipeline for service before

people who wait to call US West itself.

If you're serious about DSL, we *urge* you to sign up for StarNet DSL pre-qualification today to avoid the delays that will come for people who wait until the normal US West process begins.

*We reserve the right to change StarNet DSL pricing and terms if US West comes up with a last-minute change of plans. However, we've based our pricing on ACC approved tariffs and the prices US West used in the Phoenix roll-out of DSL. In other words, we think there's zero reason to believe anything will change. We're not trying to get hinky with you, it's just we've learned the hard way that telcos sometimes throw out last-minute curve balls.

ADSL

ISDN

T1

ADSL

Single-User

[Home](#)[Products](#)[Support](#)[Feedback](#)[Community](#)[News](#)[About Us](#)[Site Map](#)

March 20, 1998 ADSL update

We are gearing up to support US West's ADSL service rollout expected in May. Our ADSL service will support full-time Internet connections at speeds of 256k, 512k, 768k, or 1Mbps for both small and large networks. Prices are still being finalized, but should fall into the \$200-\$500/month range. We'll update the information and the chart below Real Soon Now and make an announcement in the next issue of the BUZZ. Although availability will be limited for a while, this service should prove to be a great way to get more Internet bandwidth at a great price. See our [ADSL news and resources page](#) for links on ADSL happenings.

612.291.1890
info@gofast.net

When you need industrial-strength Internet access for your network, our ADSL services deliver - with flexible high-speed connections that will grow with you.

ADSL is Asymmetrical Digital Subscriber Line -- up to 1.2 MBps downstream (toward you) and 640 KBps upstream (away from you) depending on the kind of modems are used and the capability/quality/length of the copper pairs between your location and the telco central office.

If you are located in the downtown St. Paul area, we can offer you ADSL Internet access as an alternative for dedicated high-speed access to the Internet. ADSL competes directly with T1 frame relay in terms of performance. A major advantage: it only takes a few weeks for US West to install the line, instead of the long delays and high installation fees associated with T1 data circuits.

Speed

Using the newest technology available, our ADSL services provide the bandwidth you need to put your entire network on the Net - with data rates up to 1.2Mbps.

Security

Worried about protecting your network? Our proven firewall solutions provide full access control between your network and the Internet - restricting unwanted access to internal resources.

Service

We provide everything your business needs to get on the Internet - network design, equipment sales, on-site installation, email services, and domain name services - with the knowledge and experience to do it right.

Reliability

With redundant fiber optic facilities, multiple paths to the Internet, and 24 hour technical support, we make sure you get the service you need - when you need it.

Performance

Just because you have a high-speed connection to the Internet doesn't mean that you're going fast. That's where our ATM DS3 Internet backbone steps in - making sure that there's nothing in the way to slow you down.

ADSL Service

- **Supports multiple workstations or servers, including on-site web or email servers**
- **Adjustable rates let you grow as needed**
- **24 hour monitoring & technical support.**

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 6th day of May, 1998, I have caused a copy of the foregoing **REPLY COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be served, via first-class United State Mail, postage pre-paid, upon the persons listed on the attached service list.



Kelseau Powe, Jr.

*Served via hand delivery

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